

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

JAMES GOODREAU and  
ANN GOODREAU  
*Plaintiffs*

v.

ICS BLOUNT INC.  
*Defendant*

)  
)  
)  
)  
)  
)  
)

CIVIL ACTION NO: 05-11611-WGY

**AFFIDAVIT OF BRIAN C. DEVER, ESQUIRE**

1. On or about July 15, 2005, pursuant to G.L. Ch. 223A, §6, I mailed an original Summons along with a copy of the Complaint and Jury Demand and Civil Action Cover Sheet to the above-named defendant, at 4909 S.E. International Way, Portland Oregon, via certified mail/return receipt requested No: 7001 1940 0006 8944 3840, as evidenced by the attached copy of said correspondence;
2. On or about July 22, 2005, I received return receipt No: 7001 1940 0006 8944 3840, signed by one Sandy Cleveland, with a date of delivery of July 19, 2005, as evidenced by the return receipt card attached hereto.

SIGNED and sworn to under the pains and penalties of perjury this 6th day of October, 2005.

Respectfully submitted,  
The Plaintiff,  
By their Attorney,

  
\_\_\_\_\_  
Brian C. Dever-BBO #544203  
KECHES & MALLIN, P.C.  
122 Dean Street  
Taunton, MA 02780  
(508) 822-2000

**CERTIFICATE OF SERVICE**

I, Brian C. Dever, Esquire, of the Law Firm of Keches & Mallen, P.C., attorney for the plaintiffs in this action, hereby certify that on the 6<sup>th</sup> day of October, 2005, I forwarded a copy of the foregoing AFFIDAVIT OF BRIAN C. DEVER, ESQ. by mailing, first class, postage prepaid, to the following counsel of record:

Gerald C. DeMaria, Esq.  
Higgins, Cavanagh & Cooney, LLP  
The Hay Building  
123 Dyer Street  
Providence, RI 02903-3987



---

Brian C. Dever, Esq.-BBO #544203  
KECHES & MALLEN, P.C.  
122 Dean Street  
Taunton, MA 02780  
Tel. No: (508) 822-2000

## KECHES & MALLEN, P.C.

### ATTORNEYS AT LAW

122 Dean Street  
Taunton, MA 02780  
(508) 822-2000  
Fax (508) 822-8022

[www.keches-mallen.com](http://www.keches-mallen.com)

George N. Keches  
Richard T. Mallen  
Joseph F. Agnelli, Jr.  
Brian C. Cloherty  
Brian C. Dever  
Judith B. Gray\*\*  
Charlotte E. Glinka

Kathy Jo Cook  
Claudine A. Cloutier\*  
Karen S. Hambleton  
Seth J. Elin  
Matthew F. King  
Ernest J. Palazzolo, Jr.  
Mark D. Warcup  
Daniel M. Surprenant

*Of Counsel*

Ann Marie Maguire

Gregg J. Pasquale  
Melissa A. White

\*Admitted in Massachusetts and Rhode Island

\*\*Admitted in Massachusetts, Rhode Island and Connecticut

**DIRECT ALL CORRESPONDENCE TO  
THE TAUNTON OFFICE**

**BOSTON OFFICE**  
141 Tremont Street, 6th Floor  
Boston, MA 02111  
(617) 426-7900

**FALL RIVER OFFICE**  
321 North Main Street  
Fall River, MA 02721  
(508) 676-7900

**WORCESTER OFFICE**  
41 Elm Street  
Worcester, MA 01609  
(508) 798-7900

**NEW BEDFORD OFFICE**  
167 William Street  
New Bedford, MA 02740  
(508) 994-7900

July 15, 2005

CERTIFIED MAIL-RRR NO: 7001 1940 0006 8944 3840

ICS, Blount, Inc.

4909 SE International Way

Portland, Oregon

**Re: James Goodreau, et al. v. ICS, Blount, Inc.**  
**Plymouth Superior Court Civil Action No: PLCF2005-00787-B**

Gentlemen:

On behalf of the plaintiffs in the above-captioned action, and pursuant to the provisions of Massachusetts General Laws, Chapter 223A, et seq., and the applicable provisions of Mass. R. Civ. P. 4(e), enclosed please find a copy of a Summons, together with a copy of a Complaint and Jury Demand, Civil Action Cover Sheet which have been duly filed in the Plymouth County Superior Court concerning the above-captioned case.

Please take notice that in accordance with this Summons and service of process, you have twenty (20) days after receipt of the enclosed Summons and Complaint and Jury Demand, exclusive of the day you receive same, within which to file your Answer to this Complaint and Jury Demand.

ICS, Blount, Inc.

July 13, 2005

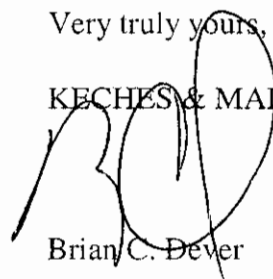
Page 2

This service of process is made in conjunction with the Long-Arm Statute for service upon out-of-state defendants.

Please refer this matter to the immediate attention of your legal representative.

Very truly yours,

KECHES & MALLIN, P.C.

A handwritten signature in black ink, appearing to read "Brian C. Dever", is written over the printed name. The signature is stylized with a large, looping "B" and "D".

Brian C. Dever

BCD:blw

Encls.

☐ Complete items 1, 2, and 3. ☐ YES Complete item 4 if Restricted Delivery is desired.  
☐ Print your name and address on the reverse so that we can return the card to you.  
☐ Attach this card to the back of the mailpiece, on the front if space permits.

1. Article Addressed to:  
 165 Blount, INC.  
 4909 SE International  
 WAY  
 Portland, Oregon

2. Received by (Printed Name) Paul Planel ☐ Agent ☐ Addressee  
 3. Date of Delivery 1/19  
 4. Is delivery address different from item 1? ☐ Yes ☐ No  
 If YES, enter delivery address below:

5. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.  
 6. Restricted Delivery? (Extra Fee) ☐ Yes

7. Article Number (Transfer from service label) 7001 1940 0006 8944 3840  
 PS Form 3811, February 2004 Domestic Return Receipt 10000-02-00-1000